

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

STATE OF MAINE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 2:22-cv-00204-JDL
)	
LIBERTY BELL MOVING & STORAGE, INC.;)	
and KEVIN FINKENAUER,)	
)	
Defendants.)	

**SECOND CONSENTED-TO MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO COMPLAINT**

Defendants Liberty Bell Moving & Storage, Inc. and Kevin Finkenaure (collectively, “Liberty Bell”), through their undersigned counsel and with the consent of counsel for the State of Maine (the “State”), hereby move, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), for an Order enlarging the time for Liberty Bell to respond to the State’s Complaint by thirty (30) days to and including November 18, 2022. The bases of this Motion are as follows:

1. On or about July 8, 2022, the State filed its Complaint in this matter in the Federal District Court for the District of Maine.
2. On September 14, 2022, the Court granted Liberty Bell’s Consented-To Motion for Enlargement of Time to Respond to Complaint, enlarging the time for Liberty Bell to respond to the Complaint from September 19, 2022 to and until October 17, 2022
3. The current deadline for Liberty Bell to respond to the State’s Complaint is October 17, 2022.
4. Liberty Bell and the State remain engaged in active discussions regarding a potential amicable resolution of this dispute. Accordingly, to conserve judicial resources and

save cost and expense for all parties, Liberty Bell respectfully requests an enlargement of time to respond to the State's Complaint by thirty (30) days from the current deadline, to and including November 18, 2022.

5. Counsel for the State CONSENTS to the requested enlargement.

WHEREFORE, Defendants Liberty Bell Moving & Storage, Inc. and Kevin Finkenaar respectfully request that the time to respond to the Complaint in this matter be enlarged by thirty (30) days from the current deadline to and including November 18, 2022.

Dated: October 13, 2022

/s/ Zachary Brandwein

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Attorneys for Defendants Liberty Bell
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Finkenaar

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing Motion for Enlargement with the Clerk of Court using the CM/ECF system, which will automatically send notice of such filing to all counsel of record in this matter.

Dated: October 13, 2022

/s/ Zachary B. Brandwein
Zachary B. Brandwein